

HEDIN LLP

1100 15th Street NW, Suite 04-108
Washington, DC 20005
www.hedinllp.com

Tyler K. Some
(202) 900-3332
tsomes@hedinllp.com

May 22, 2025

Tammi M. Hellwig
Daniel Patrick Moynihan
U.S Courthouse
500 Pearl Street
New York, New York 10007

Re: Supplement to Motion for Pro Hac Vice Admission

To the Clerk of Court,

I am writing to supplement my motion for admission pro hac vice in the matter *Kye, et al v. Crunch Holdings, LLC*, Case No. 1:25-cv-04321 (S.D.N.Y.).

In the declaration in support of my motion, I provided notice of a fine issued against me in the amount of \$150 by the Hon. Mark T. Pittman of the United States District Court for the Northern District of Texas under that court's Local Civil Rule 83.8(b) on November 26, 2024. *See Wissel v. Rural Media Group, Inc.*, Case No. 4:24-cv-999-P (Dkt. 15, Nov. 26, 2024).

Judge Pittman issued the fine because I opposed a second extension time for the defendant to answer the plaintiffs' complaint in the *Wissel* matter. Judge Pittman found that this violated the standard of professional conduct adopted by the Northern District of Texas in *Dondi Properties Corp. v. Commerce Savings & Loan Assoc.*, 121 F.R.D. 284 (N.D. Tex. 1988) (en banc). At the time, I believed that a second extension of the deadline posed a materially adverse risk to my clients' rights to have their claims litigated in the contractually-designated forum given the pendency of a related case in an improper forum in which a class-wide settlement agreement and release had been agreed upon by the parties. *See Wissel v. Rural Media Group, Inc.*, Case No. 4:24-cv-999-P (Dkt. 14, Nov. 26, 2024).

I have complied with Judge Pittman's Order to pay the fine, read several authorities, and certify my understanding of those authorities as well as my intention to comply with them moving forward. I now take care to apply both the letter and spirit of the *Dondi* decision in my professional practice, including in every jurisdiction where I am admitted, and will also do so in all proceedings before the United States District Court for the Southern District of New York, should I have the privilege of being admitted pro hac vice.

Thank you for your attention to this matter.

Sincerely,

/s/ Tyler K. Some
Tyler K. Some